

## **Exhibit J**

**Ryan P. Simmons**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

03-MDL-1570 (GBD)(SN)

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

-----X  
SUZZANNE ANDERSON, et al,

**AFFIDAVIT OF**  
**RYAN P. SIMMONS**

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW YORK )

: SS.:

COUNTY OF SUFFOLK )

RYAN P. SIMMONS, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 111 Uncas Street, Nesconset, NY 11767.
2. I am currently 21 years old, having been born on July 18, 2000.
3. I am the son of Martin C. Simmons, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My father passed away from an asthma-related drowning on July 21, 2008, at the age of 41. It had been medically determined that his asthma-related death was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.
5. I had just turned 8 years old at the time of my father's death. My dad was a really wonderful father, who always inspired me to be the best I can be. Dad instilled in me a love of

sports that continues to this day. My dad was my lacrosse coach. When he wasn't coaching me in lacrosse, he was helping me practice to become a better player. I always appreciated the way he encouraged me, and I could see how excited he was as my skills improved. When I scored my first goal, my dad was more excited than I was, which was pretty cool. What's amazing is that I was scoring goals at such a young age, but I believe that's a testament to my father's encouragement and patience. After seeing my older brother go to lacrosse camp, I asked my dad if I could go there also. While I didn't have all the necessary equipment at the time, I geared up with some hockey equipment and off I went. My dad was just a great father. I remember always wanting to spend as much time with him as possible. But the truth is, I was still just eight years old when my dad passed away, so I didn't have the full opportunity to benefit from his parenting and his experience.

6. What's frustrating is that, while I have many vivid memories of my dad and him being there for me, there are also many things that I can't remember, simply because of my youth. In fact, many times people tell stories involving me at the time my father was alive, and I have no recollection of them. There are a lot of stories I hear about my dad where it doesn't even sound like the person I knew because I was just too young to know everything about him. While there are still things I don't remember, after finding my dad's old lacrosse jersey from his high school days, I felt glad that it was something we were able to share.

7. From stories my family told me, on September 11, 2001, I was sick with an ear infection, which was part of the reason that my dad took off from work that day. Since so many from my dad's firehouse were killed on 9/11, there is a very good possibility that he would have died from the collapse of the buildings had he been working on 9/11. I'm thankful that he didn't pass away that day, because I truly would not have any memories of him. I'm grateful that I had



an additional seven years to have a dad and to get to know him. Ultimately, while he was not assigned to work that day, after learning about the terrorist attacks, my dad headed into the City as fast as he could and did as much as possible to help with the rescue efforts. I think he's a hero for what he did. I believe it took a lot of courage to fly into the face danger on a day that you're not working and under no obligation to respond. I believe there are a lot of people who would either be too afraid or just decide that they didn't want to go. But that just wasn't my dad. His natural instinct was to help those in need. I remember even when I was younger, he was always looking for ways to help. Even if it was something very minor, he was always willing to help out any way that he could.

8. I actually didn't know anything about the severity of my dad's medical conditions until after he passed away. As far as I can remember, there was nothing wrong with his health, but again, I was only eight years old at the time and was not privy to my father's respiratory disease. However, after he passed away, I learned more about why everything happened surrounding my dad's asthma and respiratory disease. I was so young at the time, and while I barely even grasped the concept of 9/11, I clearly remember going to a lot of funerals for firefighters. The day my dad passed away was particularly scary for me. I didn't know the severity of his breathing issues, and then it became so dire so quickly. Had I been more mature at the time of my dad's passing, I probably would have picked up on something that indicated my dad was having some difficulty. While on vacation on Lake Tahoe, we were boating, and I saw my dad struggling while he was helping my brother who was swimming in the lake. Because my father had had a severe respiratory event, he was unable to breathe and could not take in enough air to swim back to the boat.

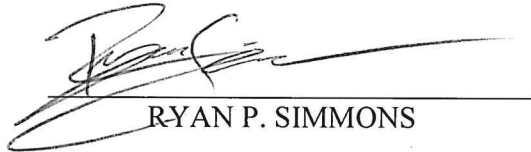
9. When my father died, I knew it was a great loss that will hurt me forever. In fact, as young as I was, I knew that I was never going to have the experiences that most other kids have in terms of spending time with their fathers. I also became despondent that he would never coach me again because nobody else would have been willing to push me as much as he did. But, honestly, the worst part about losing my dad was that, because I was so young at the time, it was virtually impossible for me to truly process all that was happening and comprehend the full gravity of the situation. The more time that passed, the more I was able to process what my dad's passing away meant to me. For example, I had a very strange experience one day when I was sitting in a middle school health class. We were discussing funerals and the people and things that are left behind. It was so strange to be sitting in a classroom with my peers, knowing that this lesson was so personal to me. Later, as I became a few years older, I could remember being in despair when I would ask a friend to hang out on the weekend and being told that they had plans to be with their dad. I would find myself traumatized, realizing I would never be able to have a day to just hang out with dad, or even send him a text message to see how he's doing. In my experience, the older one becomes, the closer they get to their parents because you learn more about who they are as people. However, since I never had that opportunity to have that type of experience, I have found that the older I get the greater the impact my dad's death had on me.

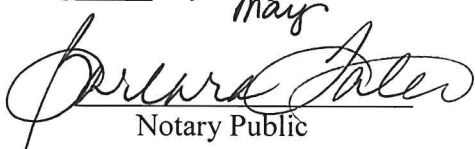
10. As a child, I'm glad I was able to have a connection with my dad over lacrosse. However, after a number of concussions from playing lacrosse in high school, I was advised to stop. Currently, I'm in college majoring in screenwriting. After recently discovering that my dad once had an interest in becoming a stand-up comedian, I feel as though it would have been nice to trade notes with him on my work and hear his thoughts as a writer. With plans to finish my

degree in the Fall, I truly hope that my father would be proud of me and everything I have accomplished.

11. My father's passing away was a huge loss for me and my entire family. All things considered, this was devastating for my mom, who suddenly had to take care of three boys on her own. While taking care of us on her teacher's salary could not have been easy, I would have to say we were generally comfortable. I give my mom a lot of credit for taking care of all our needs at great personal sacrifice.

12. I wish I could have had more time with my dad so that we could have had deeper conversations and I could have had the chance to get to know him better. It's something I will feel for the rest of my life.

  
RYAN P. SIMMONS

Sworn to before me this  
31<sup>st</sup> day of ~~April~~ <sup>May</sup>, 2022  
  
Notary Public  
BARBARA TATEO  
Notary Public, State of New York  
No. 01TA4962776  
Qualified in Richmond County  
Commission Expires 06/17/2026

**Jeannine Grudzien**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
SUZZANNE ANDERSON, et al,

**AFFIDAVIT OF**  
**JEANNINE GRUDZIEN**

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW YORK     )  
                                  : SS.:  
COUNTY OF NEW YORK   )

JEANNINE GRUDZIEN, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 18 Shelley Road, Old Bridge, New Jersey 08857.
2. I am currently 49 years old, having been born on November 20, 1972.
3. I am the daughter of Thomas Flavian Sitaca, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My father passed away from esophageal cancer and spindle cell sarcoma on August 5, 2017. It had been medically determined that these illnesses were causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.
5. My dad was a huge part of my life. He was the best dad that you could ask for and a wonderful grandfather. My daughters, who are both now adults, were always into softball. My dad was one of their coaches along with my husband. He coached my youngest from the time she was 6 years old up until the time he got too sick and couldn't do it anymore. He was known as Grandpa Coach. My dad and I were both involved in the local softball league, so I would see him every day at meetings. Afterwards, we would go to lunch or dinner, or just hang out and watch



Jerry Springer. I'm not sure why, but that was his favorite show, and it always made me laugh seeing him watch it. My dad and I just enjoyed spending time together. We didn't have to be doing anything, just being in each other's company was always enough.

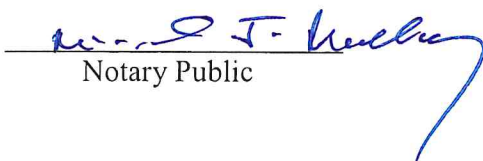
6. For a long time after September 11, 2001, I didn't get to see much of my dad. He worked for Con Edison and was down near ground zero for at least 8 to 10 months. His job was to provide the electricity so that the first responders would have ample light as they sifted through the rubble in the hopes of finding survivors, and sadly, eventually victims. That role was an important one, and he was happy to do his part in the rescue/recovery efforts.

7. I can't recall when or how or exactly when I found out about my dad's cancer. When you hear the dreaded "C" word, nothing else really matters; and when it involves your dad, it's the ugliest, scariest thing you can hear. I always tried to remain optimistic about his diagnosis, hoping it was just an illness and not a death sentence. I simply believed he'd get through it. I remember taking my dad to many appointments and follow-up appointments. I'd often have to take off from work to accompany him. My dad was always there for me when I needed him, so when he needed me, I was always there for him.

8. I wish my dad was still with us today. I miss him terribly, and I know his loss still hurts my daughters. I think of all of the things that he's missing out on now, or will in the future, like his granddaughters getting married and having kids of their own. To this day, the holidays are the most difficult times for me to get through. Honestly, I wish we could go back in time and change everything that happened from 9/11 forward. My dad would have just retired that year and lived a good, healthy life. Instead, he was taken far too soon from us, and we're left with nothing but the memories of the sweet, gentle, happy man we knew.

  
JEANNINE GRUDZIEN

Sworn to before me this  
10th day of May, 2022

  
Notary Public

MICHAEL J. MALLOY  
NOTARY PUBLIC, State of New York  
No. 41-4914497  
Qualified in New York County  
Commission Expires June 2, 2022

**Amanda L. Guidice**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

03-MDL-1570 (GBD)(SN)

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

-----X  
SUZZANNE ANDERSON, et al,

Plaintiffs,

**AFFIDAVIT OF  
AMANDA L. GUIDICE**

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW JERSEY )

: SS.:

COUNTY OF MONMOUTH)

AMANDA L. GUIDICE, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 3 Brighton Dr, Manalapan, New Jersey 07726.
2. I am currently 47 years old, having been born on March 31, 1975.
3. I am the daughter of Thomas Flavian Sitaca, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My father passed away from malignant neoplasm of the esophagus and spindle cell sarcoma on August 5, 2017. It had been medically determined that these illnesses were causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.
5. My dad was my confidante and best friend. Every decision I ever made in my entire life, he knew about and was a part of. He was always a happy, lively person before he got sick. He was such a beautiful soul. I have three kids, and he was always with us. He would take us on "missions," as he would call them. He spent a lot of time with us. Even when I was married, my husband traveled a lot, and my dad would stay with us. My children just adored



him. We would watch movies, cook, and eat. We were silly together. My dad was there for anything I or my kids needed. Our relationship was extremely close. I see so much of dad in each of my kids. He was a truly positive, loving influence in their individual lives.

6. On September 11, 2001, my dad worked for Con Edison as an underground splicer. As I watched things unfold on television, I kept praying for my dad. He finally contacted us to say that he was okay. He had gotten stuck in a manhole when it collapsed but was able to get out. He continued working after that experience so he could help others. He went every day to assist with the recovery. He was there for about a year. He worked long hours there. My dad was a strong man. He used to tell me about the things he witnessed while he was down there. It took great strength for him to put those things aside and go back each day. He would come home covered in ash and dust, and I would marvel at his ability to go through that every day. He tried to hide the stress when he was home with us, but it was written all over his face.

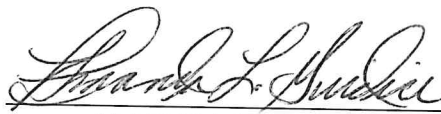
7. Before the cancer, my dad had to have triple bypass surgery. He came to my home to recover. It was about six months later that I was told he had cancer. At first, I was hopeful it was something he could get through. But as he got worse, he would say, "Amanda, my back hurts, but don't tell mommy." He always wanted to be strong for her. In my opinion, I think my dad was already too far gone. It happened so fast. He had such a rare cancer, and the doctors didn't really know how to treat it. But, by the time he was in the hospital, the cancer was really closing in on him. They wanted to try experimental treatments to try to shrink the tumor – one test after another. It was apparently how much he was suffering during this time. Over time, the treatments lessened and the doctors were just trying to find things to keep him comfortable. They tried to find foods that he could keep down – soup, Jell-O, ice cubes. No matter what they did, the tumor kept growing. It was crushing his chest. He couldn't even suck on ice cubes. At night, his lungs would fill with fluid, and the doctors would use a machine to clear the fluid, which wasn't a gentle procedure. It was like torture every night. It seemed as though they really didn't know what to do for him. He was wasting away, and it made me extremely angry.

8. At one point, I pulled a doctor aside and asked if we were going down a path towards hospice. The doctor said, "As long as we can treat him, it's not hospice." But to me, they weren't treating him, just trying different tests. I yearned for them to do something that would actually help him. One night my dad said to me, "Mandy it's time." He couldn't do it anymore. I told the doctor that if there was nothing they could do, he needed to tell my mother. My mother

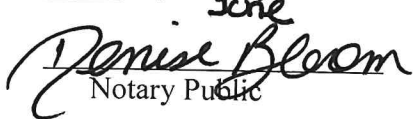
decided that we needed to meet as a family and discuss hospice. She had power of attorney and signed me over as his caregiver.

9. I knew my father wanted to die at my house. He had recovered from open heart surgery there and felt comfortable. My dad was asking if I had my house ready for him. My sisters thought it was crazy because I had three kids and there was no way my dad could get up and down the steps. I didn't care. I told them, "Look, he's dying. Mom is taking him out of the hospital and he's going to stay with me." And that's what we did. My mom and I arranged for hospice at my house. I sat my three children down (I was divorced by then) and explained that we were going to take care of their grandpa at our house. They were all so young, but I got their support. My kids hung all their sports jerseys up by my dad's bed, and my son gave him a bell to ring if he ever needed anything.

10. Emotionally I had to be strong. I would never let my dad see me cry. Even though he would have been okay with it, it wasn't something I wanted to put him through at that point. I just needed to be strong for him and for my mother. I'm not someone who shows my emotions to other people easily anyway. I would let my emotions out when I was alone. When my dad passed away, even with all the family here, I felt extremely lonely. I miss everything about him. He died here in my home. I go on for my children because that's what my dad would have wanted, but every day brings something that reminds me of him, and all my sadness comes rushing back.

  
AMANDA L. GUIDICE

Sworn to before me this  
2 day of ~~May~~ <sup>June</sup>, 2022

  
Notary Public

*Denise Bloom*  
Notary Public of New Jersey  
My Commission Expires 6/23/2023

**Christina Sitaca**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

03-MDL-1570 (GBD)(SN)

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

-----X  
SUZZANNE ANDERSON, et al,

Plaintiffs,

**AFFIDAVIT OF**  
**CHRISTINA SITACA**

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW JERSEY )

: SS.:

COUNTY OF MIDDLESEX )

CHRISTINA SITACA, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 8 Wisz Place, Sayreville, New Jersey 08872.

2. I am currently 69 years old, having been born on February 5, 1953.

3. I am the wife of Thomas Flavian Sitaca, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from malignant neoplasm of the esophagus and spindle cell sarcoma on August 5, 2017. It had been medically determined that these illnesses were causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Thomas (Tommy) and I were married for 45 years, but together for almost 50 years. When we got together, I was in high school, and he had just come home from Vietnam. He



didn't want me to tell my friends that he was six years older than me. Everybody knew us as "Chrissy and Tommy".

6. Tommy believed that family comes first. If my kids needed something, my husband would work overtime to get it for them. I was working as a waitress, and my husband encouraged me to go back to school. I was 40 years old, but I actually did it. He would tell me not to worry about money and that he'd work overtime to make up whatever we needed. Due to his encouragement, I earned my BA and two Masters. Tommy was a very true and loyal person. He was so loved by everybody. So many young kids came up to me to tell me that he was a wonderful teacher and how he got them through splicing school. If I told Tommy that I wanted to sell the house and go on a cruise around the world, he would have done it. No hesitation whatsoever. That's the kind of relationship we had. I was the enforcer, and he was the good guy.

7. Tommy was a Vietnam vet. He was an aircraft mechanic. He worked for Con Edison as an underground splicer. The day after the September 11, 2001 attacks, he was there to fix the underground electric cables. While he was down there, he almost got buried when his manhole collapsed. Thank God his partner was with him and pulled him to safety. That night, he came home and said, "I cannot believe they're telling us that the air down there is not that bad. I'm an aircraft mechanic, all that jet fuel, all that stuff falling from the building is bad." He kept asking for a mask, but all they were providing were flimsy ones that didn't offer much protection. Eventually, they fitted him for a proper mask, but that was well after he was down there for quite some time. When he wore the mask, his supervisors didn't like him wearing it. They said no one needed masks, and people in the neighborhood would get nervous seeing him in the mask and wonder if they needed to wear one themselves. Tommy believed masks were necessary, and once he got a good one, he didn't take it off. Unfortunately, the damage was already done. He was down there for about 9 months, with very little time off. It was forced overtime. He retired when he was 62, before the diagnosis. We were planning on traveling together after our kids were grown since we always put all of our money into them and their education. The plan was that once we both retired, we would take time for just the two of us. Unfortunately, that never came to be.

8. Tommy's diagnosis was very shocking and confusing for me. In June 2016, the year before he died, Tommy had a triple bypass surgery. They completely opened his chest. Nobody saw any cancer, and he recovered within a week. His breathing was fine, his heart was

fine. He healed miraculously well. At the beginning of 2017, he went to get his heart and breathing checked. He passed all the tests with flying colors. A few months later, he started talking about a tickle in his throat. He wasn't coughing a lot, he just complained of a tickle. I suggested he go back to the doctor to have his throat checked. He was reluctant to go because he was just at all the doctors, and they told him everything was clear. In April of 2017, he started having trouble swallowing. We went back to my old doctor in Queens, who sent him Tommy for imaging. When the results came back, the doctor called us and told us to contact Sloan Kettering immediately. At the beginning of May 2017, we went to Sloan Kettering, where more tests were run. They performed two biopsies and still couldn't recognize the cancer. On July 2<sup>nd</sup>, he collapsed. I called the doctors at Sloan, and they told me to take him to the Emergency Room. We went to the ER at Robert Woods Johnson Hospital. The oncologist at Robert Woods looked at all the films and said it was cancer of the thorax. The cancer mass was sitting on his lung, crushing it, and that was causing the breathing problems. When we left the hospital, he collapsed again after two hours at home and back we went to the emergency room.

9. At first, we thought the cancer was treatable. Ultimately, Tommy was admitted to Sloan Kettering. My daughter, Amanda, and I took turns staying with him at the hospital, sometimes sleeping there. Tommy could hardly eat anything because the mass was crushing his throat. Before he collapsed, I was still teaching and had three more weeks of work until summer vacation. I had to leave early some days to be at the doctor appointments. I taught in Queens and the hospital was in Manhattan. My principal was going to write me up for leaving early on so many days. I had to go down to the Department of Education Human Resources Unit and explain to them what was happening with Tommy. Between that and dealing with Tommy's condition, it was emotionally draining for me. I was worrying about him every day while I was still at work. It took a lot out of me.

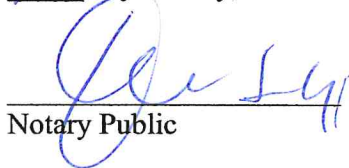
10. Very quickly, Tommy was at end stage. His cancer was very rare and was spreading like wildfire. It just kept metastasizing. It was difficult for me to comprehend. I even had an argument with one of his doctors. He kept insisting it was lung cancer, and I told him that it wasn't because testing was done that showed it didn't metastasize to his lungs – it was crushing his lungs. Tommy must have been in so much pain, but he never complained. He didn't want anyone to worry, and I didn't want him to lose hope. I always tried to be cheery in front of him. One of the doctors at the hospital wanted to tell Tommy that he was dying. I took the doctor

out of the room and emphatically told him that I had power of attorney over Tommy's medical care and he was not to tell Tommy under any circumstances that he was going to die in two or three days. I did not want my husband laying there wondering on what day he would die.

11. Tommy did not want to die in the hospital. I wanted to take him back to my daughter Amanda's house, where he had recovered before. The hospital gave us a hard time, but I didn't care. I would have rather have had him die in an ambulance than in a hospital room with no windows. I took whatever money I had, brought him home to my daughter Amanda's house, and hired a round-the-clock nurse. Two of my daughters and I were with him the whole time. My grandkids came to see him every day, because they loved him so much. We had him for six days. My third daughter came to visit, and he finally had his whole family around him. It was like he waited until we were all there. When the nurse said he doesn't have much longer, I laid next to him. I whispered to him not to worry about me. I would not be alone. We had great kids and seven beautiful grandkids, and they would be there with me. I told him I didn't want him to suffer anymore. Five hours later he was gone. Sometimes, I still think I hear him snoring at night. Even though it's going to be five years, it feels like yesterday. I think of Tommy every day and wish that he was still here with me and that we were enjoying our retirement together.

  
CHRISTINA SITACA

Sworn to before me this  
12th day of May, 2022

  
Notary Public



**Thomas John Sitaca**



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
SUZZANNE ANDERSON, et al.,

Plaintiffs,

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.  
-----X

STATE OF NEW JERSEY )

: SS.:

COUNTY OF MIDDLESEX )

**AFFIDAVIT OF CHRISTINA  
SITACA on behalf of  
THOMAS JOHN SITACA**

20-CV-00354 (GBD)(SN)

CHRISTINA SITACA on behalf of THOMAS JOHN SITACA, being duly sworn,  
deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 8 Wisz Place, Sayreville, New Jersey 08872.
2. I am currently 69 years old, having been born on February 5, 1953.
3. I am the wife of Thomas Flavian Sitaca, upon whose death my claim is based.
4. My son, Thomas John Sitaca ("T.J."), is also a plaintiff in the within action and is pursuing a solatium claim based on the illness and death of his father, Thomas Flavian Sitaca ("Thomas").

5. After his father passed away, T.J. became withdrawn and emotionally distraught. Due to my son's emotional distress, I submit this Affidavit on his behalf in connection with the pending motion for a default judgment and in support of his solatium claim.

6. On August 5, 2017, T.J.'s father, Thomas Flavian Sitaca, died from malignant neoplasm of the esophagus and spindle cell carcinoma. It had been medically determined that these illnesses were causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

7. Starting from the moment T.J. was born, my husband had an instant connection with his son and namesake. Thomas was with me in the delivery room and even cut T.J.'s umbilical cord. And I used to tease my husband about that experience, referencing the iconic line from Shakespeare's *Richard III*; however, instead of saying "A horse, a horse, my kingdom for a horse!" I said, "a son, a son, your kingdom for a son." Everybody who saw T.J. always remarked how he was the spitting image of his father. From there, T.J. and his father did everything together. When my son was in elementary school, he played basketball, and Thomas coached his team. Later, when my son practiced karate, my husband would use vacation days and travel around the United States so that he could be with T.J. at all of his karate tournaments, where he actually won several competitions. Thomas loved all our children, but T.J. may have been his favorite. Sometimes, I would joke with him, remarking that "you let your son get away with things but not the girls." Ultimately, my son came to admire his father so much that he decided to follow in his footsteps and, like his father, worked as a shop steward and splicer with Con Edison.

8. Since T.J.'s father worked as an underground splicer for Con Edison, the day after September 11, 2001, Thomas went down to the World Trade Center area to fix the underground electric cables. Despite the terrible working conditions and unsafe air, Thomas continued to work there for approximately nine months. Essentially, this amounted to forced overtime. For T.J., who later worked for Con Edison himself, he was extremely proud of his dad and the work that he did after 9/11. At the time that 9/11 happened, T.J. was attending college in North Carolina, but he called his father from there to hear about everything that happened and reminded him to be careful around Ground Zero because of all the toxins and everything floating around. When T.J. returned from college, he lived at home and continued to spend lots of time with his father. Later, when T.J. joined Con Edison, Thomas was exceptionally proud of him. At that time, Thomas was getting ready to retire, and T.J. met so many people who spoke so well of his dad. While they didn't work at the same locations, it was a good experience for the two of them.

9. After my husband was diagnosed with cancer, T.J. was there for him as much as possible. At first, Thomas didn't want anybody to know. However, after he collapsed and went to Robert Wood Johnson University Hospital, I told him that we need to let our kids know more

about his condition. We didn't tell them it was terminal because we felt that we weren't receiving accurate information from the doctors and ultimately, Robert Wood said they could treat it, but they never did. I remember bringing Thomas home from the hospital and T.J. becoming frustrated that his father wasn't getting the care he deserved. At one time, T.J. went out of his way to pick us up from Sloan Kettering and drive us home to New Jersey, from his home in the Bronx, and the light just slowly left his eyes as he could see his father's condition declining. This was especially disheartening for T.J. because he thought his father had a fighting chance to survive, but at that moment realized that that was no longer the case, and he was devastated. T.J. was quite extraordinary in the way he extended his care and support to his father when he was battling cancer. There literally wasn't enough that he could do. At a time when T.J. was starting work at seven in the morning, he still managed to pick us up from Sloan Kettering and drive us home. In order to make sure he was at the hospital on time, T.J. would skip working overtime to make sure that he could be with his dad. It was truly an amazing thing to see.

10. Ultimately, Thomas's illness seemed to come out of nowhere, and the cancer progressed extremely quickly. From the time he was diagnosed until when he passed away was just less than two months. Thomas was going to Sloan Kettering in May while they were still trying to figure out what was wrong with him and by June, he collapsed. In the beginning, Robert Wood said we can take care of it and can find ways to treat Thomas's cancer, but ultimately failed to be effective. For T.J., he was in a state of shock from hearing that there is some hope to within just a couple of months being told that his father would die within three days. So there really wasn't a more gradual progression of his father's cancer to allow any of us time to manage our emotional response. It was terrible for the whole family but hit T.J. exceptionally hard. Shortly before his father passed, T.J. was advised that Thomas may receive some additional treatment. When none of that came to pass, T.J. was totally demoralized. As difficult as this was for me, I had to internalize everything because my grandmother always taught me that there has to be one strong person at all times. That's why I decided to step up and take care of the family, especially T.J., who needed, and still needs, the most support.

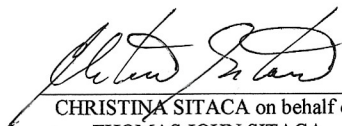
11. It was extremely painful for my son to see his father, who he admired so much, pass away after having gone through such a difficult illness. The emotional impact on T.J. was enormous, and he suffered from a severe mental breakdown after Thomas passed away. At Thomas's wake, I could see that T.J. was internalizing everything and barely spoke to anyone. It wouldn't be an exaggeration to say that T.J. went from a sane, rational person to an infant. T.J. lives at home with me and often complains that everything is a farce. Before my husband died, T.J. was the total opposite of who he is today. Since his father passed away, T.J. let go of all his friends, not even calling them on the phone. They don't come to visit with him. When I leave for work in the morning, T.J. is sitting in his father's old chair, and when I return home, he's always sitting in the same place. T.J. has become so reclusive that he doesn't even want to talk to his sisters. For example, when I host the holidays at my house, T.J. doesn't speak with his sisters and will sit in the garage when they visit. The same applies to birthdays and larger celebrations, like Christmas and Easter.

12. T.J. used to be a strong and self-reliant man. He earned a good living and would even take his nieces and nephews out shopping all the time. He was always generous and a light-hearted person. When my grandson would visit the house, Uncle T.J. would teach him karate moves. Unfortunately, all of that has changed. With his father gone, T.J. had lost the will to continue his work at Con Edison. He couldn't work there and felt that people were constantly reminding him of his father. Everywhere he looked brought back memories of his father teaching him the ropes of life on the job at the utility. Of course, when he stopped showing up, the company sent him a termination notice in the mail. My son no longer works and is dependent on me for support. He keeps to himself but is so depressed from the experience with Thomas's cancer battle that he doesn't groom himself, growing his hair down to his shoulders. Before all this happened, T.J. would get a haircut every two weeks and even get a manicure on top of that. To make matters worse, after his father passed away, T.J. suffered from alcohol abuse. This even led to a DWI conviction where his driver's license was taken away for one year. Rather than re-apply for a new license, at the end of the year, T.J. turned around and said "fine, keep it." As a result, T.J. is even less motivated to go out.

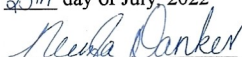
13. Thomas's illness and death had a substantial financial impact on T.J. as well. Since his father's passing away resulted in T.J.'s emotional breakdown and led to excessive

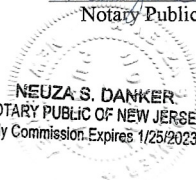
drinking and other problems, there were a number of financial repercussions for T.J. too. After losing his job, T.J. went through all of his retirement money. I only recently learned of this after I saw a letter from the IRS, which our tax accountant received, confirming that the retirement account was depleted and that he owes taxes for the early withdrawal. As a result, I had to come up with \$16,000 to pay T.J.'s federal tax bill. With T.J. unemployed and in dire straits, financially, I continue to support all of his expenses.

14. My husband was my son's best friend and the person who really helped him stay grounded. If my husband were still alive, there's no way T.J. would be in the state he is in now. Thomas was his complete support system. If T.J. was down or had any kind of problem, father and son would sit down together and talk it out. Everybody came to Thomas for advice and T.J. was no exception. They had a unique bond. In the case of my son, his father's 9/11 illness and death not only robbed him of a father but also served as the triggering event for a severe mental decline.

  
CHRISTINA SITACA on behalf of  
THOMAS JOHN SITACA

Sworn to before me this  
25th day of July, 2022

  
Notary Public

  
NEUZA S. DANKER  
NOTARY PUBLIC OF NEW JERSEY  
My Commission Expires 1/25/2023

**Kristine Steiner**



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
SUZANNE ANDERSON, et al.,

**AFFIDAVIT OF  
KRISTINE STEINER**

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF FLORIDA        )  
                                  : SS.:  
COUNTY OF PASCO        )

KRISTINE STEINER, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 3935 Pascay Court, Holiday, Florida 34691.

2. I am currently 70 years old, having been born on February 1, 1952.

3. I am the wife of Michael Steiner, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. On September 7, 2016, my husband passed away from pancreatic cancer. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. Michael and I had a good relationship. We were married just short of 30 years and did everything together. We were of the same belief system spiritually and shared that with our family and friends. We enjoyed boating on the lakes of several places we had lived. We took care of and nurtured various animals. We enjoyed landscaping, and Michael would help me on the weekend. He was instrumental in helping me implement the design of our landscaping. We

built a few ponds with waterfalls and rock gardens. We turned a yard in Rockland County that was full of rocks and weeds into something quite spectacular. Michael took care of a lot of things for me, mentally and spiritually. We had more interests together than we did apart. He was my best friend, and I was his. Since I had trouble sleeping, every night Michael would give me a back rub or a foot rub to help me relax. While Michael and I had no children together, Michael was an excellent father figure to my son, whose father and I had divorced when he was young. Although there were some trying times when my son was a teenager, Michael was kind and patient with him. Eventually, he and Michael forged a very close relationship and bond. When my son got married, Michael and I would often visit him and his wife in Connecticut, and they would come to visit us.

6. On 9/11, Michael was a teacher at John V. Lindsay Wildcat Academy, a charter school in lower Manhattan. After the planes struck the World Trade Center, the school building and all of its faculty and students were evacuated. Michael was standing outside the school building and witnessed the thick smoke coming out of the towers and also people jumping to their deaths. He was still there when the buildings collapsed and was caught in the dust cloud. He took a ferry to New Jersey and rented a car to get home. When he arrived home, he was covered in dust and soot. He returned to work a couple of weeks later when the school reopened. Although he took the train into the city each day, he would walk a distance from the subway to the school, in the vicinity of Ground Zero, to get in some exercise. He was breathing in all the toxic air, not realizing how damaging it was. He continued to work in the area until he died.

7. On July 4<sup>th</sup> weekend of 2016, Michael was having pain in his side. Years before he had suffered from gallstones, so we attributed the pain to possibly a recurrence. I made an appointment for Michael to see a gastroenterologist to have the situation checked. Michael was referred for an ultrasound. From the results of the ultrasound, Michael was then referred for an MRI. Following the MRI, the doctor contacted Michael the same day and advised that he had various tumors in his gallbladder and liver, which he believed were cancerous, and suggested that Michael have them biopsied to confirm. He also advised that Michael's bile duct was blocked, and he would need to have it unblocked as well.

8. At first, we went to our local hospital to get the biopsy and to look into unblocking the bile duct because Michael was becoming jaundiced and was still in pain. Before even getting the results of the biopsy, the doctor confirmed that Michael had cancer and that it



was very bad. He recommended that we see a specialist immediately. Michael's brother assisted me in setting up three appointments with separate doctors, each of whom gave a different opinion regarding surgery and chemotherapy. We were advised that the cancer was too vast for surgery. On August 8, 2016, Michael was accepted into a clinical trial at Memorial Sloan Kettering, which was deemed his only hope. Just prior to beginning the trial, Michael's liver count dropped. He wouldn't be eligible for the trial unless his liver count was at a certain level. Michael's illness went south after that. He developed sepsis which required several trips to the hospital. The doctors were able to get the sepsis under control, which we were happy about. They advised that since surgery wasn't an option, Michael could have chemotherapy treatment closer to home in Westchester but would still have to have monthly visits with the doctor at Sloan. Michael was becoming weaker each day. When we went to have the port inserted to receive the chemotherapy, Michael collapsed when we got there. He had to be transported back to Sloan, where we were advised that the cancer had progressed so aggressively that chemotherapy would not be effective. Michael was given approximately one week to live, and hospice was recommended. One week to live was a devastating blow since he was originally given six months to live. How did it go from that to one week? My head was spinning. I didn't want Michael to have hospice at a facility, so his brother arranged to have everything we needed brought to our home, and we did home hospice in our living room so Michael could face the garden he loved so much. I did my best to keep him comfortable, but he was in agony. Many of Michael's students and former students came by the vanload to our home to say goodbye to him while he was still conscious. Many friends came as well.

9. The impact Michael's illness and death had on my life is indescribable. I depended on Michael for everything, mentally and spiritually, and it became a total role reversal. I had to take care of all of Michael's needs. Everything happened so quickly, and it seemed that it was one negative diagnosis after another. It was extremely difficult to stay positive for Michael's sake, but he knew he wasn't going to make it. He had his brothers promise him that they would take care of me. Michael was in so much pain at one point that he only wanted me to touch him. The slightest touch would cause him agony. I had to be taught how to administer shots in Michael's stomach to prevent blood clots in his legs and how to regulate his morphine. It was a terrible ordeal. Sometimes, the only temporary relief he got was if I rubbed his stomach lightly. We tried to hire a nurse to help with Michael's care, but he didn't like her and wanted no

part of her. All he wanted was me. I was happy to do whatever I could do for my husband, but none of it was pleasant. I was completely stressed and devastated knowing that I was losing my best friend and partner of 30 years. I watched him die a little each day from the time of his diagnosis until his death. For the last few days of his life, he was in a coma, and I wasn't even able to speak to him. It was heartbreaking, but I was somewhat relieved that he wasn't in excruciating pain. I slept on the couch next to his bed until he passed away.

10. Michael's illness and ultimate death greatly impacted me financially as well. While I did receive some death benefits and pay from the school Michael worked for, I was eventually forced to move into a smaller house because I could no longer afford the large mortgage payment on the house that Michael and I shared and loved so much. During the transition period from one house to the other, there were some delays which caused me to have to stay with friends for a while, then with my sister in Florida for a short period, and then again with friends in New York. It was a rough time, and I was doing all of it without my husband. I also had to settle all of Michael's estate affairs at the same time. It was a very lonely period in my life. My entire way of life changed.

11. Before he became ill, Michael and I had been looking forward to his retirement in October of 2016. He died a month before he would have been eligible to retire. I had already been retired for quite some time, and Michael and I were planning on enjoying life together as retirees and spending much more time together doing the things we loved. We'll never have the opportunity to do that now. I miss Michael every day. Such a huge part of me is missing without him. I have no desire to ever be with any other man. No one could ever replace him.

  
KRISTINE STEINER

Sworn to before me this  
11 day of July, 2022

  
Notary Public

